

**Exhibit F**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
MDL-NO. 16-2738 (FLW) (LHG)

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IN RE: JOHNSON & JOHNSON

TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

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ORAL DEPOSITION OF:

DANIEL L.  
CLARKE-PEARSON, MD

VOLUME 2

\* \* \* \*

FRIDAY, AUGUST 27, 2021

\* \* \* \*

MASTROIANNI & FORMAROLI, INC.

Certified Court Reporting & Videoconferencing

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1 Do you remember that question?

2 MS. BROWN: Form.

3 THE WITNESS: I do.

4 BY MS. THOMPSON:

5 Q. Would you give the opinion that  
6 long-term talcum powder use was a substantial  
7 contributing cause of a mucinous ovarian cancer?

8 A. **No, I would not.**

9 Q. Would you give the opinion that  
10 long-term talcum powder use was a substantial  
11 contributing cause in a case of stromal or germ cell  
12 tumor?

13 A. **A stromal or germ cell tumor? Not an**  
14 **epithelial tumor, but a stromal or germ cell tumor?**  
15 **I just want to be clear.**

16 Q. Right.

17 A. **No, I do not. There is no evidence**  
18 **that that increases the risk of stromal or germ cell**  
19 **tumors.**

20 Q. You were asked a lot questions over the  
21 two days that included the cause, but for the only  
22 cause. Tell us what your opinions actually are about  
23 talcum powder as a causative factor in the  
24 plaintiffs' cases that we've been talking about the  
25 last two days?

1 BY MS. BROWN:

2 Q. Yep.

3 A. And talc.

4 Q. I'm sorry. What's the association  
5 between smoking and talc?

6 A. That it increases the risk of mucinous  
7 tumors in patients exposed to talc. So maybe I've  
8 misspoken. I thought we were talking specifically  
9 about only talc.

10 Q. Okay. I'm just getting a little  
11 confused.

12 A. Me too.

13 Q. Smoking is associated with mucinous  
14 tumors, correct?

15 A. Yes.

16 Q. And as I understood your testimony to  
17 Ms. Thompson, you do believe that talcum powder is  
18 associated with mucinous ovarian cancer, correct?

19 A. That's what I -- I don't think Ms.  
20 Thompson asked me that question about mucinous or did  
21 you. We were talking about stromal and germ cell.

22 MS. THOMPSON: And -- and --

23 MS. BROWN: No testifying.

24 BY MS. BROWN:

25 Q. Let me just ask you, because maybe

1 it's late in the day, we're getting confused.

2 I understood your testimony to be that  
3 talcum powder does not cause mucinous epithelial  
4 ovarian cancer.

5 Is that true?

6 **A. I think that's my belief, yes.**

7 MS. BROWN: Okay. I have no further  
8 questions. Thank you very much.

9 MS. THOMPSON: I'm sorry. I forgot to  
10 ask my questions about Ms. Converse.

11 Will you give me permission --

12 MS. BROWN: Go right ahead.

13 MS. THOMPSON: They were on a different  
14 page and I missed them.

15 (EXAMINATION OF DR. CLARKE-PEARSON BY MS. THOMPSON:)

16 Q. I do have a few questions about  
17 Ms. Converse that I had not covered before.

18 Ms. Brown suggested that Dr. Schwartz  
19 concluded that talcum powder was not a cause of Ms.  
20 Converse's ovarian cancer.

21 Is that an accurate statement?

22 **A. That's not how I understand his**  
23 **deposition.**

24 Q. Did he even know that she used talcum  
25 powder?